

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Susan A. Lowe	:	
	:	Chapter 13
	:	
Debtor	:	No.: 17-16493MDC

RESPONSE OF DEBTOR'S TO THE MOTION FOR RELIEF OF
AUTOMATIC STAY FILED BY CAPITOL ONE AUTO FINANCE

COMES NOW, Debtor, Susan A. Lowe, hereinafter referred to as "Debtor," by and through her undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by Capitol One Auto Finance "Movant", hereby avers the following:

1. Admitted.
2. Admitted.
3. Denied.
4. Denied.
5. Denied.
6. Denied.
7. Denied.
8. Denied. By way of further response, Debtor intends to cure any post-petition arrears that are proved to be due and owing.
9. Denied.
10. Denied.
11. Denied.
12. Denied.

13. Denied.

14. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362

Respectfully submitted,

Dated: January 22nd, 2018

/s/ Brad J. Sadek, Esq.
Attorney for the Debtor
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